



In response to **ET Docket No. 05-356**, TriSquare Communications, Inc. has the following comments.

There are currently many wireless security and surveillance cameras on the market, which operate in the ISM bands and meet the requirements under FCC Part 15 rules 15.247 and 15.249 without waiver. Several of these surveillance systems are marketed for use by "Home land Security" and law enforcement agencies.

We do not believe it is in the public interest to waive the FCC rules to allow the operation of high powered, low technology, and spectrally inefficient analog modulation systems. The proposed system would give a significant cost advantage to the petitioners of ET 05-356 over numerous other wireless surveillance camera manufacturers that operate within the FCC rules. There is no guarantee that the petitioners won't saturate the surveillance camera market with cameras operating 24/7 in populous areas, causing harmful interference to their competitors systems and to numerous other systems operating legally under FCC rules in the 902/928 MHz ISM band. Additionally, granting a waiver of compliance with 15.249(a) not only raises the allowed transmitter power, but also waives the harmonic radiation levels specified in 15.249(a). Increased harmonic levels from a 900 MHz transmitter can cause interference to other radio services.

The potential interference to low power wireless systems operating legally under 15.249 and spectrally efficient systems operating under 15.247 in the 902/928 MHz ISM band can not be over stated.

We respectfully request that the FCC stand by the rules as adopted and adhered to by a large installed base of products and services that demonstrate the intent of cooperative sharing of the ISM band spectrum.